

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE

TRISTEN BURRIS,

Plaintiff,

Case No.: 2:25-cv-01336

v.

**COMPLAINT**

TRIDENT SEAFOODS CORPORATION,

Defendant.

Now comes Plaintiff, Tristen Burris by and through counsel undersigned, O'Bryan Baun Karamanian, complaining against Defendant as follows:

1. Territorial jurisdiction and venue lie in this action, Defendant being at home in this district.

**COUNT I**

2. Federal Question jurisdiction (28 USC 1331) is founded under the Jones Act (46 USCA 30104), for negligence and under the general maritime law for unseaworthiness, maintenance and cure.

3. At all times material to issues herein Plaintiff served as a crewmember/employee of Defendant aboard its vessel(s) with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of the ship.

4. On or about August 29, 2022, while acting within the scope and course of his

1: -cv-employment aboard the F/V Pacific Ram, Plaintiff was ordered to board another of Defendant's  
2 vessels, the F/V Majesty to retrieve parts and materials for conducting maintenance and repairs  
3 aboard the F/V Pacific Ram, when because of the unseaworthiness of the vessel including, but not  
4 limited to contamination of the decking with oil, grease, and other slippery materials, lack of  
5 sufficient and competent non-skid material, Plaintiff was caused to slip, fall, and sustain severe and  
6 permanently disabling injuries to his left and right lower extremities as a result thereof, because of  
7 the failure of Defendant to exercise reasonable care, maintain a seaworthy vessel, and failure to  
8 provide a safe place to work.  
9

## 10 COUNT II

11  
12 5. The foregoing allegations are hereby reasserted as though fully stated herein.

13 6. This count is alleged in the alternative.

14 7. Should Defendant claim Plaintiff to be a longshoreman, harbor worker, or ship  
15 repairman per 33 USC 901, et seq., insofar as he may have received LHWCA compensation  
16 benefits, this claim is asserted in the alternative.  
17

18 8. Federal Question jurisdiction (28 USC 1331) exists *vis a vis* 33 USC 905(b) against  
19 Defendant in its capacity as vessel owner for the negligently created unsafe conditions, breach of  
20 turnover duty, negligent active involvement/control, and/or failure to intervene described in  
21 allegation 2 above.  
22

23 9. Defendant breached its obligation to exercise reasonable care on Plaintiff's behalf  
24 by way of the unsafe conditions alleged aforesaid, on the vessel.

## 25 DAMAGES

26 10. Defendant's wrongful acts aforesaid cause or contributed to Plaintiff's damages,  
27 *inter alia*, as follows:  
28

- a. Pain and suffering, past future.
- b. Mortification, humiliation, fright shock and embarrassment.
- c. Loss of earnings and earning capacity.
- d. Hospital, pharmaceutical and other cure expenses.
- e. Aggravation of prior condition, if any there be.
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed.
- g. Mental anguish.
- h. Found (under Count II in the alternative).
- i. Maintenance, cure, and/or attorney fees (under Count II in the alternative).

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

Respectfully submitted,

O'Bryan Baun Karamanian

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WESTERN DISTRICT OF WASHINGTON  
SEATTLE

TRISTEN BURRIS,

Plaintiff,

v.

Case No.:

**DEMAND FOR TRIAL BY JURY**

TRIDENT SEAFOODS CORPORATION,

Defendant.

**NOW COMES** Plaintiff, Tristen Burris, by and through counsel undersigned, O'Bryan Baun Karamanian, and hereby demands trial by jury in the above-referenced cause of action.

Respectfully submitted,

O'Bryan Baun Karamanian

/s/ Gary Wm. Baun

Gary Wm. Baun

Attorney for Plaintiff

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